

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

13

United States of America

v.

CHRISTIAN MAIRE

Case: 2:17-mj-30562

Judge: Unassigned,

Filed: 10-23-2017 At 01:26 PM

CMP USA V. MAIRE (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2013 through on or about Oct. 23, 2017 in the county of Oakland and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. § 2251(a) and (e), 18 U.S.C. § 2252A(a)
(2)(A) and (b)(1) and 2252A(a)(5)(B) and (b)(2);
2422; and 2252A(g)(2)Producing, attempting to produce and conspiracy to produce child
pornography; conspiracy to receive child pornography; conspiracy to access
with intent to view child pornography; participation in a child exploitation
enterprise, coercion and enticement of a minor

This criminal complaint is based on these facts:

See Attached Affidavit

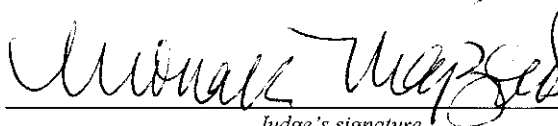
☒ Continued on the attached sheet.

Complainant's signature

Special Agent Adam Christensen, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: OCT 23 2017

Judge's signature

City and state: Detroit, Michigan

Hon. Mona K. Maizoub, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF APPLICATION FOR COMPLAINT AND
ARREST WARRANT

I. INTRODUCTION

I, Adam Christensen, having been first duly sworn, do hereby depose and state as follows:

1. I have been employed as a Special Agent of the FBI since 2010, and am currently assigned to the Detroit Division. While employed by the FBI, I have investigated federal criminal violations related to child exploitation, and child pornography. I have gained experience through training and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation, and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2251 and 2252A, and I am authorized by the Attorney General to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for **Christian Maire** (XX/XX/1978) for violations of 18 U.S.C. § 2251(a) and (e) (producing, attempting to produce, and conspiracy to produce

child pornography); 18 U.S.C. § 2252A(a)(2)(A) and (b)(1) (receipt and distribution of, conspiracy to receive and distribute, and attempt to receive and distribute child pornography); 18 U.S.C. § 2252A(a)(5)(B) and (b)(2) (possession of, knowing access, conspiracy to access, or attempted access with intent to view child pornography); 18 U.S.C. § 2422 (coercion and enticement); and § 2252A(g)(2) (participating in a child pornography enterprise).

3. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent (SA) with the FBI. Because this affidavit is being submitted for the limited purpose of securing authorization for the requested arrest warrant, I have not included each and every fact known to me concerning this investigation. Instead, I have set forth only the facts that I believe are necessary to establish the necessary probable cause that **Maire** has violated Title 18 U.S.C. §§ 2251(a) and (e), 2252A(a)(2)(A) and (b)(1), 2252A(a)(5)(B) and (b)(2), 2422, and 2252A(g)(2).

Background of Investigation

4. This affidavit, complaint, and arrest warrant are part of an ongoing investigation related to the sexual exploitation of children (specifically preteen and teenage girls) on a chatroom-based website. To protect the integrity of the investigation, the website will be referred to throughout this affidavit as Website A.

5. Website A is a social media platform where people, using usernames of their choosing, enter chatrooms and communicate with other users in real time. The chatrooms have a list of users in the lower right corner of the screen, an active chat conversation on the lower left corner of the screen, and a large space above these for individuals to live stream their activities via web camera. In each chatroom, at any given time, up to two users can broadcast their activities via web camera.

6. The investigation reveals that Website A is primarily used by adult men seeking to sexually exploit teenage and preteen girls. These men pretend to be teenage boys, teenage girls, or others to entice the victims to engage in sexually explicit activity on camera. Throughout the course of this investigation, the FBI has identified more than 50 minor victims, with dozens more yet unidentified, who remove clothing, engage in sexual activity, and otherwise pose for other users on the various chatrooms on Website A. The investigation also reveals that in many instances groups of users on Website A work together to coordinate the recruitment, enticement, and coercion of the

victims into producing child pornography.

Minor Victim-1's Victimization

7. On June 29, 2017, MV-1 (DOB XX/XX/2000), a resident of the Eastern District of Michigan, was forensically interviewed by the FBI. During the interview, MV-1 stated that she had consistently been on Website A in a room with four to five individuals that she believed to be teenage males. This group of individuals enticed MV-1 to display her naked body and, among other things, to show her bottom and touch her vagina while on webcam on Website A. She stated that the group members also asked her to engage in sexual activity with her brother and to insert objects into her vagina, but that she never did those things.

8. The FBI reviewed logs from Website A to determine the identity of the offenders who enticed MV-1 to engage in sexual activity on webcam. These logs show, amongst other things, the IP addresses utilized to login to specific chatrooms, the date of the logins, and the names of those chatrooms. By reviewing the logs for MV-1's IP address, the FBI discovered that numerous individuals, including offender S2,¹ consistently visited a chatroom on Website A with MV-1 on at least a dozen different occasions.

¹ The FBI knows the identities of S2, Website A, Website B, and the true usernames utilized by the defendants (including the username of **NEW YORK TARGET #2** discussed below), but they are not revealed here to protect the integrity of an ongoing investigation.

S2's Arrest and Cooperation Regarding the Group

9. On July 27, 2017, after the FBI executed a federal search warrant at his residence, S2 agreed to speak to law enforcement. S2 identified MV-1 and stated that he had enticed her to visit Website A so that she could be targeted by a group he was working with. The objective of the group was to entice minor females to undress, masturbate, and engage in other types of sexual activity on webcam on Website A. S2 stated that he had been working with this particular group on Website A since 2012 or 2013 through the summer of 2017.²

10. S2 identified the target age of the victims of this group as 15-17 year old females. Members of the group usually recorded these sexual acts and sometimes shared the recordings with other group members. S2 stated that he and other group members were typically on the website targeting minors multiple times per week. He admitted that he had personally recorded dozens of minor females engaged in sexual activity on Website A. In addition to MV-1, S2 identified several other minors, to include MV-2 and MV-3, as victims of the group. These minors were all victimized on multiple occasions.

² S2 acknowledged being a part of a second group as well. Six United States-based members of that group (including S2) were arrested, indicted for their participation in a child exploitation enterprise, and are currently detained in the Eastern District of Michigan. To date, over 1,000 child pornography videos have been recovered from S2's devices, numerous of which he recorded from Website A.

11. From S2's statements and a review of social media conversations between S2 and members of this group, I know that this group used certain terminology. For example, they used the term "hunt" to refer to searching for minor female targets, the term "win" to refer to successfully getting a minor to engage in sexually explicit conduct on webcam, the term "cap" or "capture" to refer to their recordings of minors, and the term "bate" as an abbreviation for masturbate. They used a minus symbol and a number to signify how much younger than 18 their victims were (e.g., -3 means 15 years old, -4 means 14 years old, etc.).

12. They also had their own roles or positions. For example, "talkers" in the group were in charge of talking to the girls to get them to engage in sexual activity. "Hunters" were in charge of getting the girls on to Website A and alerting other group members to the fact that they had brought the minors to Website A. The "loopers" would play a previously recorded video of a different minor chatting and/or performing sexual acts in a chatroom. The "looper" pretended to be the minor depicted in the video that is broadcast to the targeted minor victim as if it is occurring in real-time.

13. According to S2, from 2012 or 2013 through April of 2017, the group organized themselves on Website B. Website B contained a password-protected spreadsheet where the group maintained a list of minor females that they were targeting and what rooms on Website A were associated with them, along with a link

to the social media account that had been used to target the minor female. It also included a chat function so that the group members could coordinate their activities on Website A.

14. In April of 2017, the group started using a private server on Discord, another chat-based website, to organize their efforts to entice minor females to engage in sexual activity on camera. S2 provided consent to search his Discord account. Reviewing the group's chats on the Discord server supported S2's statements. Specifically, a review of the Discord group chat showed had the same name as the group had used on Website B. Likewise, the group members involved in the Discord chat included numerous usernames that S2 had identified as group members. The chat conversations started on April 29, 2017, and went through October of 2017, and their content (i.e., discussion about girls, rehashing activity on Website A, recalling conversations on Website B, etc.) corroborated statements made by S2.

15. In these conversations, group members posted sexually explicit images of girls³, links to Website A chatrooms, talked about "perving," discussed "hunting" and "win," referenced MV-2 (who the investigation has revealed has a DOB in 2001) and MV-3 (who the investigation has revealed has a DOB in 2002), discussed girls who were on

³ The girls that they discussed and posted links to have not yet been identified. S2 said that both MV-2 and MV-3 were under the age of 18. Chat conversations involving both of these minors corroborated S2's statements and also provided information about their age.

camera in Website A rooms, and discussed sexual activity that girls had engaged in or were engaging in (e.g. “she was showing pussy”; “she used to dance in thong and bra on periscope, but never showed”; “1k show tits.”).

Group Member NEW YORK TARGET #2

16. S2 identified the username **NEW YORK TARGET #2**⁴ as the leader of the group. He stated that **NEW YORK TARGET #2** created the Website B discussion forum, invited others to the group, and generally organized the group’s activity. **NEW YORK TARGET #2** was the primary “hunter” or “linker” for the group, bringing minor females to Website A so that they could be targeted and alerting the other members to their presence. He also targeted minors one-on-one, recording them engaging in sexual activity via webcam and then sharing it with the other group members.

17. **NEW YORK TARGET #2** used numerous social media websites as a “hunting ground,” pretending to be a teenage boy and sending them links to Website A chatrooms as well as engaging in explicit chat conversations with them. For example, the following conversation was recovered from one of MV-1’s social media accounts with **NEW YORK TARGET #2**. This conversation took place in July of 2015, when MV-1 was 14 years old.

⁴ **NEW YORK TARGET #2** is a username that this user used that was a combination of two of the other

NEW YORK TARGET #2: Hehe so you liked our little fantasy about the three of us in a tent?

MV-1: OMG I LOVED IT

NEW YORK TARGET #2: Haha that's good ;) That's be pretty hot.

MV-1: VERY HOT

NEW YORK TARGET #2: Hehe I hope you think about that when you're in your sleeping bag... ;)

NEW YORK TARGET #2: And reach down between your legs... imagining me reaching down and sliding my fingers inside you...

MV-1: Omggg <3333 :L

18. **NEW YORK TARGET #2's** organization and leadership of the group was evident from the content of the group's conversations on Discord. **NEW YORK TARGET #2** took responsibility for deleting the content of Website B and posted numerous links to potential girls for the group to target. For example, on May 6, 2017, he said, "oh good, a really cute one I was making progress with is on You guys game?" He posted a link to a girl and said, "she was showing pussy." On May 10, he posted a link to a girl's profile picture who appeared to be between the ages of 15 and 17 years old. He stated about the girl, "this one is definitely talkative. Seems like she could be fun." He then posted another image of her and said, "-2." As explained above, the

FBI's investigation of S2's group has revealed that this indicates that **NEW YORK TARGET #2** believed her to be 16.

NEW YORK TARGET #2 is Christian Maire

19. By reviewing Website A logs, the FBI discovered an IP address that was used to login to rooms associated with S2's group from April 24, 2016 to August 23, 2016. That IP address, 66.24.37.201, was also used on multiple occasions by **NEW YORK TARGET #2** to login to the social media account above that he used to talk to MV-1. The FBI subpoenaed Time Warner for information relating to this IP address. Time Warner provided responsive material, indicating that the IP address resolved back to Christian Maire at XX Hillcrest Avenue in Binghamton, New York, and that he had been assigned this IP address for the duration of the April 24, 2016 to April 2017 time period.

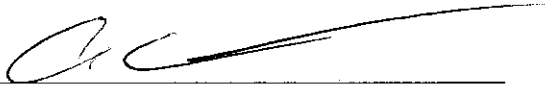
20. On September 12, 2017, the FBI also subpoenaed Discord for IP information relating to logins by the group members, including **NEW YORK TARGET #2**. On October 5, 2017, Discord provided responsive material, listing the IP addresses used by **NEW YORK TARGET #2** between September 17, 2016 and June 27, 2017. One of these IP addresses, was the same 66.24.37.201 IP address above that consistently visited chatrooms with other known members of the group on Website

A and resolved back to the residence of Christian Maire. Moreover, there was another IP address that resolved back to Maire's residence.

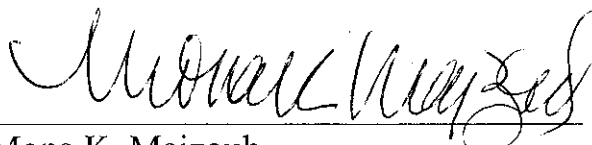
21. On October 23, 2017, a federal search warrant authorized in the Northern District of New York was executed at the residence of **Christian Maire**, XXX Hillcrest Avenue, Binghamton, New York. **Maire**, his wife, and their two children were present during the execution of the warrant. **Maire** voluntarily spoke with the agents and stated that he had visited Website A with the intention of viewing child pornography while on the site. He specifically recalled visiting chatrooms that were mentioned in the group's chat conversations on Discord and that the FBI has determined to be associated with the group through its analysis of the Website A logs. While on Website A, he used a variety of usernames and admitted that he used the usernames associated with **NEW YORK TARGET #2**. **Maire** further stated that he utilized a variety of social media and email accounts, including Kik, Discord, MyLOL, and Gmail.

CONCLUSION

22. Based on the foregoing, there is probable cause to believe **Maire** has produced, attempted to produce, and conspired to produce child pornography in violation of 18 U.S.C. § 2251(a) and (e). There is also probable cause to believe that **Maire** also coerced and enticed, or attempted to coerce and entice, a minor to engage in sexually explicit conduct, in violation of 18 U.S.C. § 2422; and has participated in a child pornography enterprise, in violation of 18 U.S.C. § 2252A(g)(2).


Special Agent Adam Christensen
Federal Bureau of Investigation

Sworn to me this 23rd day of October, 2017


Mona K. Majzoub
United States Magistrate Judge